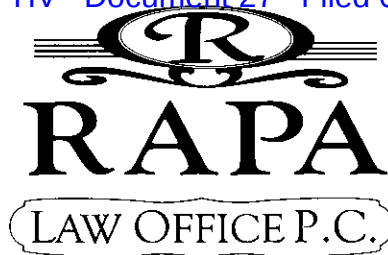


Jason M. Rapa, Esquire  
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Lehighton, PA 18235  
610.377.7730  
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*\*Please reply to this address*

609 Hamilton St., 1st Floor  
Sovereign Building  
Allentown, PA 18101  
toll-free 866.740.6117

June 15, 2010

Via Electronic & U.S. Mail

Ronald S. Canter, Esquire  
Law Offices of Ronald S. Canter, LLC.  
11300 Rockville Pike, Suite 1200  
Rockville, MD 20852  
[rcanter@roncanterllc.com](mailto:rcanter@roncanterllc.com)

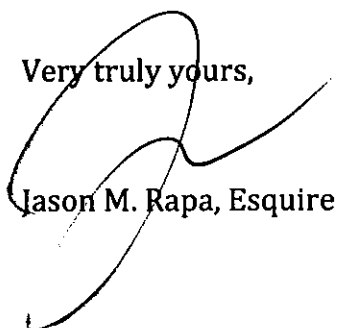
RE: Sherry McHugh v. Delanore, Kemper & Associates, LLC et al.  
MDPA Civil Action No.: 3:09-CV-000631

Dear Mr. Canter:

I am serving you with notice that Plaintiff hereby accepts Defendant's Rule 68 Offer of Judgment as attached herein and tendered by Defendant in the above-referenced matter on June 7, 2010.

A copy of this acceptance along with the Offer of Judgment will be filed with the Court via ECF.

Very truly yours,



Jason M. Rapa, Esquire

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
CASE NO. 09-631**

Sherry K. McHugh	)
	)
Plaintiff	)
	)
v.	)
	)
Delanore, Kemper & Associates, LLC.,	)
Ed Beckham and Mel Clark	)
	)
Defendants	)

**ACCEPTANCE OF OFFER OF JUDGMENT**

Plaintiff, Sherry McHugh, hereby accepts the offer tendered by the Defendant on June 7, 2010, a copy of which is attached hereto as Exhibit "A".

Date: 6/15/10

s/ Jason M. Rapa, Esquire  
Jason M. Rapa, Esquire  
RAPA LAW OFFICE, P.C.  
141 S. 1<sup>st</sup> Street  
Lehigh, PA 18235  
(610) 377-7730

**EXHIBIT "A"**

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
COURT FILE NO.: 09-CV-631**

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Sherry K. McHugh,

Plaintiff

v.

Delanore, Kemper & Associates, LLC., Ed  
Beckham and Mel Clark

Defendants

---

**DEFENDANT'S RULE 68 OFFER OF JUDGMENT**

Defendant, Delanore, Kemper & Associates, LLC, hereby serves its Offer of Judgment on the Plaintiff pursuant to Rule 68, Federal Rules of Civil Procedure:

1. Defendant, Delanore, Kemper & Associates, LLC will allow judgment to be entered against it and in favor of the Plaintiff in the sum of \$5,000.00 together with Court costs, plus reasonable attorney fees.
2. The entry of judgment in favor of the Plaintiff against Defendant Delanore, Kemper & Associates, LLC will operate as a full and complete satisfaction of all the Plaintiff's claims against Defendants Delanore, Kemper & Associates, LLC and Mel Clark a/k/a Melvin V. Lundie and Ed Beckham.
3. The parties will attempt to reach an agreement regarding Plaintiff's attorney fees.
4. If the parties are unable to agree as to attorney fees, Plaintiff will file a motion for attorney fees with the Court.
5. The circumstances under which this offer may be accepted and/or is deemed rejected are set out in Rule 68, Federal Rules of Civil Procedure.

THE LAW OFFICES OF RONALD S. CANTER, LLC

/s/ Ronald S. Canter

Ronald S. Canter, Esquire  
PA Bar #94000  
11300 Rockville Pike, Suite 1200  
Rockville, MD 20852  
Direct Dial (301) 770-7490  
Direct Fax (301) 770-7493  
E-Mail: rcanter@roncanterllc.com  
Attorney for Defendant

4660 Trindle Road  
Suite 300  
Camp Hill, PA 17011  
Local Address

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon the individual listed below by Overnight Delivery on this 7th day of June, 2010 to:

Jason M. Rapa, Esquire  
Rapa Law Office, P.C.  
141 S. 1st Street  
Lehighton, PA 18235  
Attorney for Plaintiff

/s/ Ronald S. Canter

Ronald S. Canter, Esquire  
Attorney for Defendant